

COHN LIFLAND PEARLMAN HERRMANN & KNOOP LLP

COUNSELLORS AT LAW

PARK 80 WEST - PLAZA ONE • 250 PEHLE AVENUE, SUITE 401 • SADDLE BROOK, N.J. 07663

201-845-9600 • FAX 201-845-9423

Peter S. Pearlman, Esq.

psp@njlawfirm.com

Direct Dial: 551-497-7131

Cell: 201-709-0597

General E-mail: clphk@njlawfirm.com

Internet Address: www.njlawfirm.com

November 28, 2011

VIA ECF

Hon. William J. Martini, USDJ
M.L. King Jr. Federal Building & Courthouse
50 Walnut Street, Room 4076
Newark, NJ 07102

Re: Ricky Dudley v. Christian W.E. Haub, et al.
Case No.: 11-5196 (WJM-MF)
Our File No.: 38,382-0

Dear Judge Martini:

I am local counsel for the City of New Haven Employees' Retirement System and Plumbers and Pipefitters Locals 502 & 633 Pension Trust Fund (jointly, the "Pension Funds"), and proposed liaison counsel for the class in the above-referenced action. I am writing regarding The Pension Funds' Motion for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel (the "Motion"), which was filed on November 8, 2011.

As set forth in the Motion, the Private Securities Litigation Reform Act of 1995 ("PSLRA") dictates the appointment of lead plaintiff and lead counsel in securities class actions. *See* 15 U.S.C. §78u-4(a)(3)(B). Pursuant to the PSLRA, any class member, regardless of whether the class member filed a complaint in the action, is entitled to move for appointment as lead plaintiff within 60 days of the published notice about the action. 15 U.S.C. §78u-4(a)(3)(A)-(B). Here, the notice was published on September 9, 2011, giving class members until November 8, 2011 to file motions for appointment as lead plaintiff. The Pension Funds are the only class members who moved for appointment as lead plaintiff.

In addition, any opposition to the Pension Funds' Motion must have been filed no later than November 21, 2011. No opposition to the Motion was filed. The Pension Funds set forth in their Motion how they meet the PSLRA's requirements of a lead plaintiff, and have selected counsel experienced in the prosecution of complex securities class actions. Consequently, because (i) they meet the qualifications of a lead plaintiff, (ii) no other movant has come forward to seek lead plaintiff appointment, (iii) no opposition to the Pension Funds' Motion was filed, and (iv) they have chosen experienced counsel, the Pension Funds respectfully request that Your Honor grant the Pension Funds' Motion, appoint them as lead plaintiff in the above-referenced

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action and approve their selection of Robbins Geller Rudman & Dowd LLP as lead counsel and Cohn Lifland Pearlman Herrmann & Knopf LLP as liaison counsel.

Respectfully yours,

Peter S. Pearlman

PSP:glv